State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

US EPA

Mary A. Gade, Director
217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

August 9, 1995

Mr. Robert D. Garcia
Heritage Environmental Services, Inc.
Post Office Box 337
Lemont, Illinois 60439

Mr. Frank E. Dalton
Metropolitan Water Reclamation
District of Greater Chicago
100 East Erie Street
Chicago, Illinois 60611

Re: 0311620007 -- Cook County
Heritage Environmental Services
ILD085349264
Date Received: June 9, 1995
Log No. B-128
RCRA Permits

Dear Mr. Garcia and Mr. Dalton:

This letter is in response to the Soil Removal Documentation Report and Soil Removal Certification Statement for the soil removal efforts at the Barge Cleaning Transfer Point and the Drainage Ditch Leading to the Chicago Sanitary and Ship Canal at the above-referenced facility.

The subject report and certification were prepared and submitted by Heritage Remediation/Engineering, Inc. The report and certification, signed by Mr. Garcia, the facility manager, and William D. Mains P.E., indicate that the soil removal efforts have been completed in accordance with the final RCRA permit issued to the facility and the Agency's February 28, 1995 letter. As a result, Heritage Environmental Services has completed the corrective action requirements for all of the solid waste management units (SWMUs) identified in its RCRA permit (a list of these SWMUs is provided below:

SWMU No.	NAME
1	Truck Transfer Area
2	Outdoor Container Storage Area
3	Van Trailer Container Storage Area
4	Old Aerosol Can Crushing Unit
5	Roll-Off Box Storage Area
6	Drum Crushing Unit
7	Underground Sanitary Sewer Waste Holding Tanks
8	Barge Cleaning Transfer Point
9	Drainage Ditch Leading to the Chicago Sanitary and Ship Canal
10	"Other" [Background Areas]

As stated in Condition 1 of the Agency's February 28, 1995 letter, site safety plans for any future excavation and/or construction at the Outdoor Container Storage Area, the Van Trailer storage Area, the Old

Aerosol Can Crushing Unit, and the paved portion of the Drainage Ditch Leading to the Chicago Sanitary and Ship Canal must address worker exposure to remaining soil contamination.

The Agency's Division of Land Pollution Control must be notified of any SWMU(s) identified in the future in accordance with Section IV., Condition F.1. of the final RCRA permit.

Finally, the four witness wells associated with the leak detection system at the Drum Processing Building should be monitored at two week intervals and re-sampled and analyzed if significant volumes of water accumulate, as proposed in the cover letter associated with the subject submittal. Water should be removed from the witness wells when it is observed in the system and be managed in accordance with IAC 721, 722, and 809.

Should you have any questions regarding this letter, please contact Tom Fiersten at 217/524-3311.

Sincerely,

Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

cc: USEPA, Region V -- George Hamper

ECB:TFF:tf
JKM

B-128-CA-1

cc: Maywood
USEPA

JKR
WTS

HERITAGE ENVIRONMENTAL SERVICES, INC.

P.O. Box 337
Lemont, IL 60439-0337
Phone: 708/739-1151
FAX: 708/739-9491

Illinois Environmental Protection Agency
Bureau of Land -- #33, Permit Section
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

June 1, 1995

RECEIVED
JUN - 9 1995
PERMIT SECTION

RE: Contaminated Soil Removal
Heritage Environmental Services, Inc.
Canal Bank Road, N.E.
Lemont, Illinois 60439
ILD085349264 DLPC 0311620007

Dear Mr. Chappel:

Enclosed are the original and two copies of the report documenting the soil removal activities as recommended in the RCRA Facility Investigation report and requested in the February 28, 1995 correspondence from the IEPA.

With respect to item 6 from the February 28, 1995 Agency letter to Heritage Environmental Services, Inc., the following is a discussion of the activities related to the four witness wells and the on-site water well.

As part of the RFI activities the witness wells for the lining system located in the Drum Processing Building were inspected. The presence of liquid in these wells was unexpected and the contents were sampled on May 20, 1994. The results of this analysis (received in late June) indicated the presence of volatile and traces of semi-volatile organic compounds as reported in the RFI report.

Wells 1, 2, and 4 were purged of approximately 25 - 35 gallons in early August, 1994 and the liquids were disposed properly. Well 3 did not contain any water at that time. On August 11, 1994 wells 1 and 2 were sampled again. Results of this sampling still indicated the presence of volatile organic compounds. Copies of these analytical results are attached to this letter.

The wells were then monitored from August 23, 1994 through September 19, 1994 at least three times per week for liquid accumulation. During this period approximately 20 - 30 gallons of liquid was removed from each well. The maximum volume removed from one well during one day was 17.6 gallons from WW-4.

During the period from September 20, 1994 through October 17, 1994 the wells were checked at least three times per week for liquid accumulation. During this period less than 6 gallons of liquid was removed from each well. The maximum volume removed from one well during one day was 3 gallons from WW-4. On many days there was no liquid observed in the wells. For the first half of the month of October, there was less than six gallons of liquid removed from all of the wells in aggregate.

Subsequent to October 17, 1994 the monitoring period for the witness wells was changed to once every two weeks. A measurable amount of liquid has not been observed in the wells through the end of May, 1995 (a period of approximately 30 weeks).

Since the volume of water recovered from these wells has decreased significantly over the monitoring period, HERITAGE recommends that the monitoring frequency remain at a two week interval. Should a significant volume of liquid accumulate, the wells will be re-sampled and analyzed at that time.

As a separate issue, the on-site water supply well was used for decontamination water when the RFI activities took place. As a consequence, a water sample was collected from the well. This sample exhibited minor concentrations of volatile organic constituents.

Beginning in approximately August of 1994, the on-site water well became subject to the Safe Drinking Water Act because the number of employees served increased above the regulatory threshold. The on-site well is currently classified as a non-transient, non-community water supply system. The well has been sampled on a quarterly basis for volatile organic constituents (among other regulated compounds) and the results have been reported to the Illinois Department of Public Health (IDPH) as required. The IDPH contacted HERITAGE in April, 1995 to schedule a routine inspection of the water supply system.

Should you have any questions, please contact the undersigned at (708) 739-1151.

Sincerely,

HERITAGE ENVIRONMENTAL SERVICES, INC.

Ron Wilkins

Ron Wilkins, CHMM
Compliance Manger

RW/sh

cc: Gary Lindgren - Heritage Indianapolis
Angie Martin - Heritage Indianapolis

2030RW95.L1

CERTIFICATE OF ANALYSIS

Service Location	Received	Project	Lab ID
HERITAGE ENVIRONMENTAL SERVICES, INC. COMMERCIAL LABORATORY OPERATIONS 1319 MARQUETTE DRIVE ROMEOVILLE, IL 60441 (708)378-1600	11-AUG-94	2936	C160323
	Complete	PO Number	
	24-AUG-94	4860-02328	
	Printed	Sampled	
	26-MAY-95	11-AUG-94 15:15	

Report To

BOB MILLMAN
HERITAGE REMEDIATION/ENGINEERING
1319 MARQUETTE DRIVE
ROMEOVILLE, IL 60441

Bill To

DOUG PLESNER
HERITAGE ENVIRONMENTAL SERVICES
CANAL BANK ROAD
P.O. BOX 337
LEMONT, IL 60439

Sample Description

PROJECT: HTC LEMONT - JOB #6702
SAMPLE ID.: OW-1
DESCRIPTION: WATER IN OBSERVATION WELL WATER - GRAB

VOLATILE ORGANICS SW846-8240A

Analyst: H. WILLIAMS Analysis Date: 16-AUG-94 14:14 Instrument: GC/MS VOA Test: 0510.3.0 INDI

Parameter	Result	Det. Limit	Units
ACETONE	EST 2900	20	ug/L
ACROLEIN	BDL	50	ug/L
ACRYLONITRILE	BDL	70	ug/L
BENZENE	BDL	5	ug/L
BROMODICHLOROMETHANE	BDL	5	ug/L
BROMOFORM	BDL	5	ug/L
BROMOMETHANE	BDL	10	ug/L
CARBON DISULFIDE	BDL	5	ug/L
CARBON TETRACHLORIDE	BDL	5	ug/L
CHLOROBENZENE	BDL	5	ug/L
CHLOROETHANE	BDL	10	ug/L
CHLOROFORM	BDL	5	ug/L
CHLOROMETHANE	BDL	10	ug/L
DIBROMOCHLOROMETHANE	BDL	5	ug/L
CIS-1,3-DICHLOROPROPENE	BDL	5	ug/L
DICHLORODIFLUOROMETHANE	BDL	5	ug/L
1,1-DICHLOROETHANE	100	5	ug/L
1,2-DICHLOROETHANE	BDL	5	ug/L
1,1-DICHLOROETHENE	BDL	5	ug/L
1,2-DICHLOROPROPANE	BDL	5	ug/L
ETHYL BENZENE	11	5	ug/L
TRICHLOROFLUOROMETHANE	BDL	5	ug/L
2-HEXANONE	BDL	10	ug/L
DICHLOROMETHANE (METHYLENE CHLORIDE)	10	5	ug/L
METHYL ETHYL KETONE	EST 3700	10	ug/L
4-METHYL-2-PENTANONE	200	10	ug/L
STYRENE	BDL	5	ug/L
1,1,2,2-TETRACHLOROETHANE	BDL	5	ug/L
TETRACHLOROETHENE	BDL	5	ug/L
TETRAHYDROFURAN	BDL	25	ug/L
TOLUENE	43	5	ug/L
1,2-DICHLOROETHENE (CIS AND TRANS)	BDL	5	ug/L
TRANS-1,3-DICHLOROPROPENE	BDL	5	ug/L

Parameter	Result	Det. Limit	Units
1,1,1-TRICHLOROETHANE	EST 360	5	ug/L
1,1,2-TRICHLOROETHANE	BDL	5	ug/L
TRICHLOROETHENE	BDL	5	ug/L
VINYL ACETATE	BDL	10	ug/L
VINYL CHLORIDE	BDL	10	ug/L
XYLENES (O/M/P-XYLENE)	17	5	ug/L
...			
SURROGATE RECOVERY			

DICHLOROETHANE-D4	110		% Rec
TOLUENE-D8	96		% Rec
4-BROMOFLUOROBENZENE	97		% Rec

Dilution necessary due to high concentration of target compounds.
On this instrument, packed column has been replaced by capillary column with 8240 criteria.

VOLATILE ORGANICS SW846-8240A

Analyst: H. WILLIAMS Analysis Date: 17-AUG-94 21:52 Instrument: GC/MS VOA Test: 0510.3.1 INDI

Parameter	Result	Det. Limit	Units
ACETONE	2900	2000	ug/L
ACROLEIN	BDL	5000	ug/L
ACRYLONITRILE	BDL	7000	ug/L
BENZENE	BDL	500	ug/L
BROMODICHLOROMETHANE	BDL	500	ug/L
BROMOFORM	BDL	500	ug/L
BROMOMETHANE	BDL	1000	ug/L
CARBON DISULFIDE	BDL	500	ug/L
CARBON TETRACHLORIDE	BDL	500	ug/L
CHLOROBENZENE	BDL	500	ug/L
CHLOROETHANE	BDL	1000	ug/L
CHLOROFORM	BDL	500	ug/L
CHLOROMETHANE	BDL	1000	ug/L
DIBROMOCHLOROMETHANE	BDL	500	ug/L
CIS-1,3-DICHLOROPROPENE	BDL	500	ug/L
DICHLORODIFLUOROMETHANE	BDL	500	ug/L
1,1-DICHLOROETHANE	BDL	500	ug/L
1,2-DICHLOROETHANE	BDL	500	ug/L
1,1-DICHLOROETHENE	BDL	500	ug/L
1,2-DICHLOROPROPANE	BDL	500	ug/L
ETHYL BENZENE	BDL	500	ug/L
TRICHLOROFLUOROMETHANE	BDL	500	ug/L
2-HEXANONE	BDL	1000	ug/L
DICHLOROMETHANE (METHYLENE CHLORIDE)	BDL	500	ug/L
METHYL ETHYL KETONE	2100	1000	ug/L
4-METHYL-2-PENTANONE	BDL	1000	ug/L
STYRENE	BDL	500	ug/L
1,1,2,2-TETRACHLOROETHANE	BDL	500	ug/L
TETRACHLOROETHENE	BDL	500	ug/L
TETRAHYDROFURAN	BDL	2500	ug/L
TOLUENE	BDL	500	ug/L
1,2-DICHLOROETHENE (CIS AND TRANS)	BDL	500	ug/L
TRANS-1,3-DICHLOROPROPENE	BDL	500	ug/L
1,1,1-TRICHLOROETHANE	EST 320	500	ug/L
1,1,2-TRICHLOROETHANE	BDL	500	ug/L
TRICHLOROETHENE	BDL	500	ug/L
VINYL ACETATE	BDL	1000	ug/L

Parameter	Result	Det. Limit	Units
VINYL CHLORIDE	BDL	1000	ug/L
XYLENES (O/M/P-XYLENE)	BDL	500	ug/L
...			
SURROGATE RECOVERY			

DICHLOROETHANE-D4	114		% Rec
TOLUENE-D8	96		% Rec
4-BROMOFLUOROBENZENE	103		% Rec

1:100 Dilution necessary due to high concentration of target compounds. On this instrument, packed column has been replaced by capillary column with 8240 criteria.

Sample Comments

BDL Below Detection Limit
EST Estimated Value

Sample chain of custody number 2596.

Approved : D. Sulcinas

CERTIFICATE OF ANALYSIS

Service Location	Received	Project	Lab ID
HERITAGE ENVIRONMENTAL SERVICES, INC. COMMERCIAL LABORATORY OPERATIONS 1319 MARQUETTE DRIVE ROMEOVILLE, IL 60441 (708)378-1600	11-AUG-94	2936	C160322
	Complete	PO Number	
	24-AUG-94	4860-02328	
	Printed	Sampled	
	26-MAY-95	11-AUG-94 11:15	

Report To

BOB MILLMAN
HERITAGE REMEDIATION/ENGINEERING
1319 MARQUETTE DRIVE
ROMEOVILLE, IL 60441

Bill To

DOUG PLESNER
HERITAGE ENVIRONMENTAL SERVICES
CANAL BANK ROAD
P.O. BOX 337
LEMONT, IL 60439

Sample Description

PROJECT: HTC LEMONT - JOB #6702
SAMPLE ID.: OW-2
DESCRIPTION: WATER IN OBSERVATION WELL WATER - GRAB

VOLATILE ORGANICS SW846-8240A

Analyst: H. WILLIAMS Analysis Date: 16-AUG-94 13:26 Instrument: GC/MS VOA Test: 0510.3.0 INDI

Parameter	Result	Det. Limit	Units
ACETONE	EST 5000	20	ug/L
ACROLEIN	BDL	50	ug/L
ACRYLONITRILE	BDL	70	ug/L
BENZENE	BDL	5	ug/L
BROMODICHLOROMETHANE	BDL	5	ug/L
BROMOFORM	BDL	5	ug/L
BROMOMETHANE	BDL	10	ug/L
CARBON DISULFIDE	EST 5	5	ug/L
CARBON TETRACHLORIDE	BDL	5	ug/L
CHLOROBENZENE	BDL	5	ug/L
CHLOROETHANE	BDL	10	ug/L
CHLOROFORM	8	5	ug/L
CHLOROMETHANE	BDL	10	ug/L
DIBROMOCHLOROMETHANE	BDL	5	ug/L
CIS-1,3-DICHLOROPROPENE	BDL	5	ug/L
DICHLORODIFLUOROMETHANE	BDL	5	ug/L
1,1-DICHLOROETHANE	EST 410	5	ug/L
1,2-DICHLOROETHANE	10	5	ug/L
1,1-DICHLOROETHENE	BDL	5	ug/L
1,2-DICHLOROPROPANE	BDL	5	ug/L
ETHYL BENZENE	7	5	ug/L
TRICHLOROFLUOROMETHANE	BDL	5	ug/L
2-HEXANONE	BDL	10	ug/L
DICHLOROMETHANE (METHYLENE CHLORIDE)	27	5	ug/L
METHYL ETHYL KETONE	EST 3100	10	ug/L
4-METHYL-2-PENTANONE	EST 1100	10	ug/L
STYRENE	BDL	5	ug/L
1,1,2,2-TETRACHLOROETHANE	BDL	5	ug/L
TETRACHLOROETHENE	BDL	5	ug/L
TETRAHYDROFURAN	140	25	ug/L
TOLUENE	33	5	ug/L
1,2-DICHLOROETHENE (CIS AND TRANS)	BDL	5	ug/L
TRANS-1,3-DICHLOROPROPENE	BDL	5	ug/L

HERITAGE ENVIRONMENTAL SERVICES, INC. **Lab Sample ID: C160322**

Parameter	Result	Det. Limit	Units
1,1,1-TRICHLOROETHANE	EST 460	5	ug/L
1,1,2-TRICHLOROETHANE	BDL	5	ug/L
TRICHLOROETHENE	BDL	5	ug/L
VINYL ACETATE	BDL	10	ug/L
VINYL CHLORIDE	BDL	10	ug/L
XYLENES (O/M/P-XYLENE)	32	5	ug/L
...			
SURROGATE RECOVERY			

DICHLOROETHANE-D4	112		% Rec
TOLUENE-D8	102		% Rec
4-BROMOFLUOROBENZENE	106		% Rec

Dilution necessary due to high concentration of target compounds.
On this instrument, packed column has been replaced by capillary column with 8240 criteria.

VOLATILE ORGANICS SW846-8240A

Analyst: H. WILLIAMS Analysis Date: 17-AUG-94 21:05 Instrument: GC/MS VOA Test: 0510.3.1 INDI

Parameter	Result	Det. Limit	Units
ACETONE	4400	2000	ug/L
ACROLEIN	BDL	5000	ug/L
ACRYLONITRILE	BDL	7000	ug/L
BENZENE	BDL	500	ug/L
BROMODICHLOROMETHANE	BDL	500	ug/L
BROMOFORM	BDL	500	ug/L
BROMOMETHANE	BDL	1000	ug/L
CARBON DISULFIDE	BDL	500	ug/L
CARBON TETRACHLORIDE	BDL	500	ug/L
CHLOROBENZENE	BDL	500	ug/L
CHLOROETHANE	BDL	1000	ug/L
CHLOROFORM	BDL	500	ug/L
CHLOROMETHANE	BDL	1000	ug/L
DIBROMOCHLOROMETHANE	BDL	500	ug/L
CIS-1,3-DICHLOROPROPENE	BDL	500	ug/L
DICHLORODIFLUOROMETHANE	BDL	500	ug/L
1,1-DICHLOROETHANE	EST 410	500	ug/L
1,2-DICHLOROETHANE	BDL	500	ug/L
1,1-DICHLOROETHENE	BDL	500	ug/L
1,2-DICHLOROPROPANE	BDL	500	ug/L
ETHYL BENZENE	BDL	500	ug/L
TRICHLOROFLUOROMETHANE	BDL	500	ug/L
2-HEXANONE	BDL	1000	ug/L
DICHLOROMETHANE (METHYLENE CHLORIDE)	BDL	500	ug/L
METHYL ETHYL KETONE	1800	1000	ug/L
4-METHYL-2-PENTANONE	BDL	1000	ug/L
STYRENE	BDL	500	ug/L
1,1,2,2-TETRACHLOROETHANE	BDL	500	ug/L
TETRACHLOROETHENE	BDL	500	ug/L
TETRAHYDROFURAN	BDL	2500	ug/L
TOLUENE	BDL	500	ug/L
1,2-DICHLOROETHENE (CIS AND TRANS)	BDL	500	ug/L
TRANS-1,3-DICHLOROPROPENE	BDL	500	ug/L
1,1,1-TRICHLOROETHANE	EST 430	500	ug/L
1,1,2-TRICHLOROETHANE	BDL	500	ug/L
TRICHLOROETHENE	BDL	500	ug/L
VINYL ACETATE	BDL	1000	ug/L

HERITAGE ENVIRONMENTAL SERVICES, INC. **Lab Sample ID: C160322**

Parameter	Result	Det. Limit	Units
VINYL CHLORIDE	BDL	1000	ug/L
XYLENES (O/M/P-XYLENE)	BDL	500	ug/L
...			
SURROGATE RECOVERY			

DICHLOROETHANE-D4	113		% Rec
TOLUENE-D8	98		% Rec
4-BROMOFLUOROBENZENE	107		% Rec

1:100 Dilution necessary due to high concentration of target compounds. On this instrument, packed column has been replaced by capillary column with 8240 criteria.

Sample Comments

BDL Below Detection Limit
EST Estimated Value

Sample chain of custody number 2596.

Approved : S. Sudermann

SOIL REMOVAL DOCUMENTATION REPORT

Heritage Environmental Services, Inc.

Canal Bank Road, N.E.

Lemont, Illinois 60439

ILD085349264

DLPC 0311620007

June 1, 1995

TABLE OF CONTENTS

1.0 INTRODUCTION

On April 27, 1995, Heritage Environmental Services, Inc. (HES) conducted the soil removal activities recommended in the RCRA Facility Investigation report. Specifically, the removal of slightly contaminated soil located at the Barge Cleaning Transfer Point and at the discharge point (south end) of the Drainage Ditch to the Chicago Sanitary and Ship Canal.

The removal activities were performed by personnel from the remediation group located in Romeoville, Illinois. These personnel are 40-hour HAZWOPER trained. The remedial activities were overseen by an Illinois Registered Professional Engineer from MVS Partners, Inc. located in Hinsdale, Illinois.

2.0 SITE DESCRIPTION

Heritage Environmental Services, Inc. is located on Canal Bank Road, N.E. in Lemont, Illinois. The site is situated in Section 20 (NE¼, NE¼) and Section 21 (NW¼, NW¼) Township 37 North, Range 11 East of the Third Principal Meridian.

The site is underlain predominantly by dolomite/limestone bedrock covered with a thin veneer of surface soils in various areas.

3.0 SUMMARY OF ACTIVITIES

On April 27, 1995 the necessary personnel and equipment mobilized to the site to perform the soil removal activities. A Health and Safety Plan was provided for the activities and reviewed prior to commencement. Activities began at approximately 9:25 a.m. at the Barge Cleaning Transfer Point. Sand bags were placed to prevent precipitation run-off from flowing through the area. Approximately 2-inches of surface soils on top of the bedrock were removed from this area by manually shovelling and loading into the bucket of a Bobcat. One bucket-load of soil was removed from this area (less than one cubic yard). The sand bags were removed upon completion of the activities in this area.

Activities began at approximately 10:25 a.m. at the south end of the Drainage Ditch. The spill control gate was closed to prevent precipitation run-off from flowing through the area. Approximately 2-inches of surface soil/sediment on top of the bedrock were removed from this area by manually shovelling and loading into the bucket of a Bobcat. Two bucket-loads of soil was removed from this area (less than two cubic yards). Upon completion of the activities in this area, the spill control gate was reopened.

All removal activities were completed on April 27, 1995. The estimated cost for these activities was $3,500.00.

The soil was transferred to a roll-off box destined for incineration (combined with like wastes fitting within the wastestream profile). The total volume of soil resulting from these activities was less than 3 cubic yards.

The manifest number for the roll-off box which contained the soil removed is IL 6819039. A copy of the waste manifest is included in Appendix I.

Photographs with subject headings documenting the soil removal activities are included in Appendix II.

Figures indicating the areas of soil removal are included as Appendix III.

4.0 CERTIFICATION

Soil Removal Certification Statement

Heritage Environmental Services, Inc.

Log B-128

The soil removal efforts at the Barge Cleaning Transfer Point and the Drainage Ditch leading to the Chicago Sanitary and Ship Canal have been completed in accordance with the requirements of the Agency's February 28, 1995 letter to Heritage Environmental Services, Inc. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

ILD053549264
USEPA ID Number

HERITAGE ENVIRONMENTAL SERVICES, INC
Facility Name

Robert D. Garcia, Jr.
Signature of Owner/Operator

6/6/95
Date

ROBERT D. GARCIA, JR. FACILITY MANAGER
Name and Title

William D Mains
Signature of Registered P.E.

6/6/95
Date

062-043267
IL Registration #

William D. Mains
Name of Registered P.E.

Mailing Address of Registered P.E.

MVS Partners, Inc.
5702 Grant Street
Hinsdale, Illinois 60521

Registered P.E.'s Seal:

APPENDIX I
MANIFEST COPY

STATE OF ILLINOIS — ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

P.O. BOX 19276 — SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761

State Form LPC 62 8/81 IL532-0610

FOR SHIPMENT OF HAZARDOUS AND SPECIAL WASTE

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter.) — EPA Form 8700-22 (Rev. 6-89) — Form Approved. OMB No. 2050-0039. Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD 085349264 — Manifest Document No.: 19039

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address — Location If Different
Heritage Environmental Services,Inc.
Canal Bank Road,NE-20 Box#337
Lemont,Il. 60439-0337

A. Illinois Manifest Document Number: IL-6819039 — FEE PAID IF APPLICABLE

B. Illinois Generator's ID: 0311620007

4. 24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS: 800-327-5221

5. Transporter 1 Company Name: Heritage Transport,Inc. — 6. US EPA ID Number: IND 058464114

C. Illinois Transporter's ID: 15587

D. [illegible] Transporter's Phone

7. Transporter 2 Company Name — 8. US EPA ID Number

E. Illinois Transporter's ID

F. [illegible] Transporter's Phone

9. Designated Facility Name and Site Address — 10. US EPA ID Number
Waste Technologies Industries
1250 Saint George Street
East Liverpool, Ohio 43920 — OHD 980615541

G. Illinois Facility's ID

H. Facility's Phone: 216-385-7336

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ,Hazardous Waste Solid,N.O.S.,9,NA9077, PG III,(F001,F002,F003,F004,F005), ERG #31	001.	CM	00020	Y	EPA HW Number: XX F003; Authorization Number:
b.					EPA HW Number: XX; Authorization Number:
c.					EPA HW Number: XX; Authorization Number:
d.					EPA HW Number: XX; Authorization Number:

J. Additional Description for Materials Listed Above
Additional Codes: D001,D007,D008 WS3147-161
Authorization #:HE-95052402 P.O.#4860-04807
Profile#:HELI-001
Pricing Code:31

K. Handling Codes for Wastes Listed Above In Item #14

15. Special Handling Instructions and Additional Information
Emergency response:708-739-1151/Paul Cajec

16. GENERATOR'S CERTIFICATION: I hereby delare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and selected the best waste management method that is available to me and that I can afford.

Printed/Typed Name: PAUL H KROEGER SR — Signature: Paul H Kroeger Jr — Date: Month 05 Day 23 Year 95

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: LARRY E. BOWERS — Signature: Larry E. Bowers — Date: Month 05 Day 23 Year 95

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name — Signature — Date: Month Day Year

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1001 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

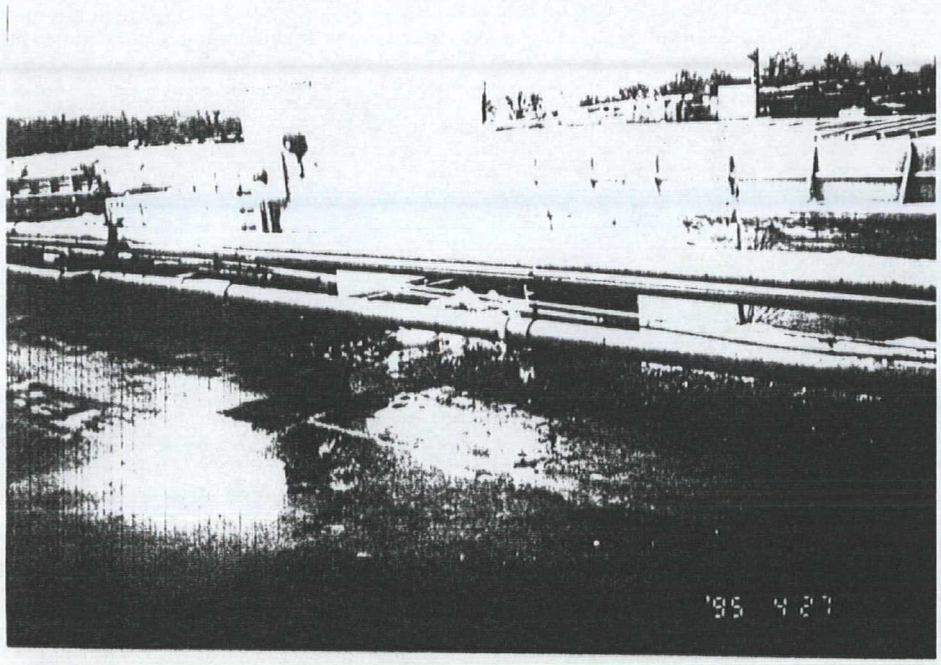
COPY 6: GENERATOR'S COPY

In case of a spill call the Illinois Office of Emergency Response at 217 / 782-7860 and the National Response Center at 800 / 424-8802 or 202 / 426-2675.

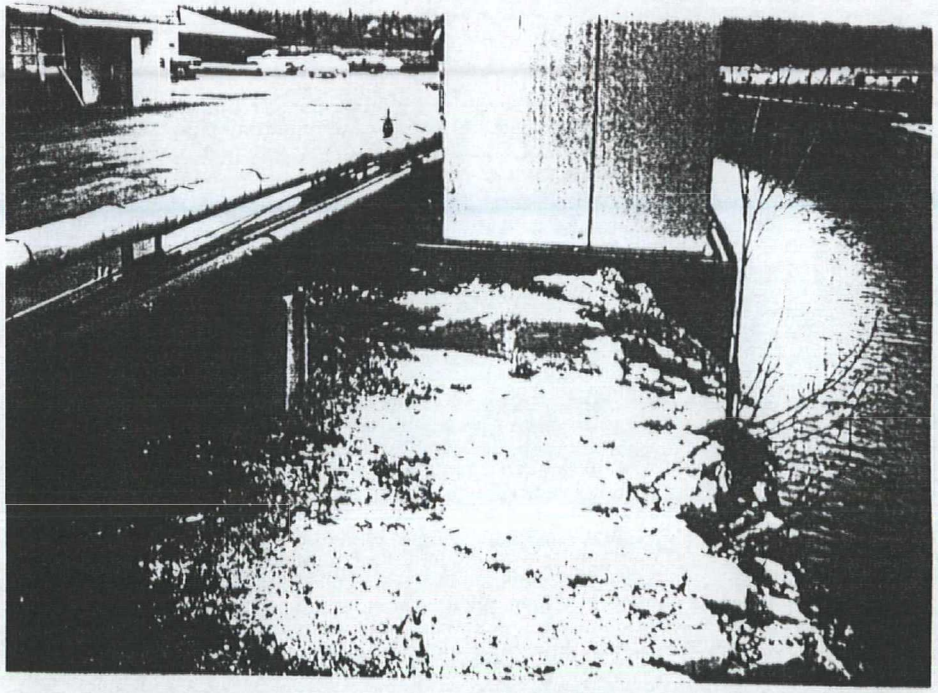
APPENDIX II
PHOTOGRAPHS OF REMOVAL ACTIVITIES

APPENDIX II - PHOTOGRAPHS

BARGE CLEANING TRANSFER POINT



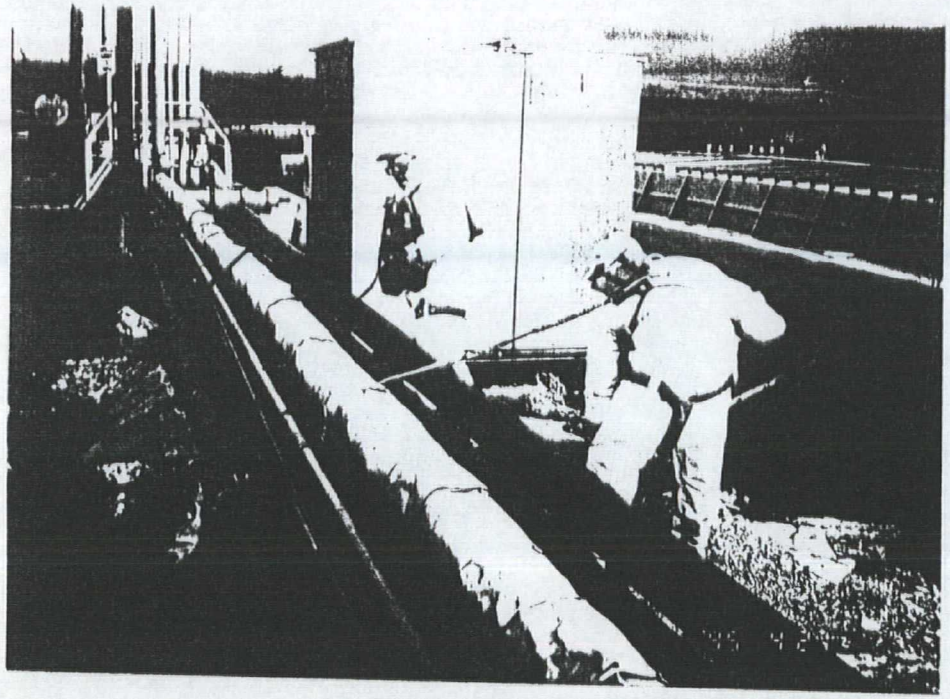
Area prior to clean-up
(looking northeast)



Area prior to clean-up
(looking north)

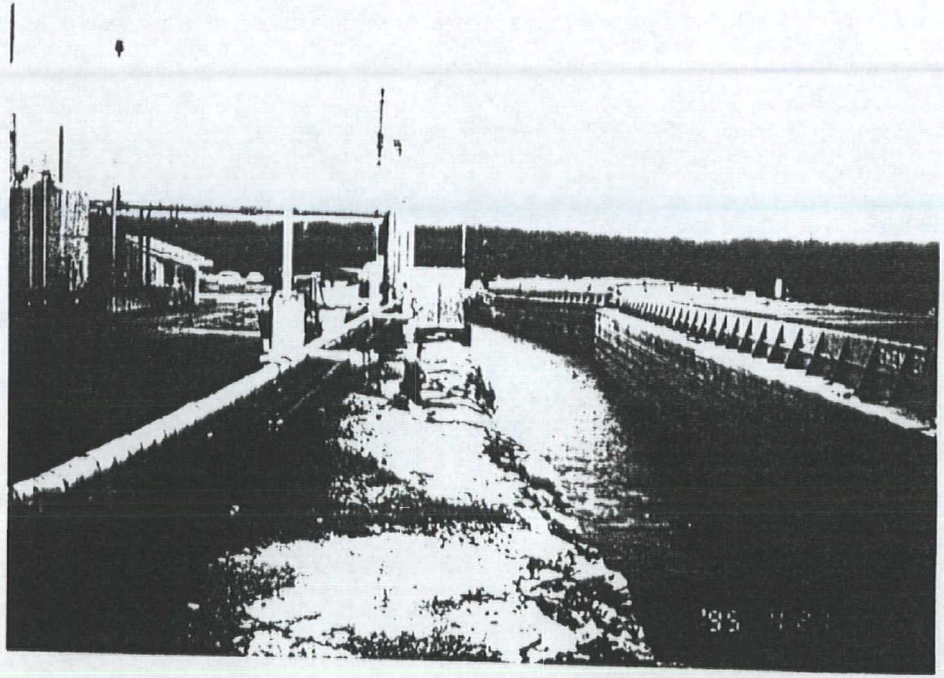
APPENDIX II - PHOTOGRAPHS

BARGE CLEANING TRANSFER POINT



Clean-up in progress

(looking northeast)

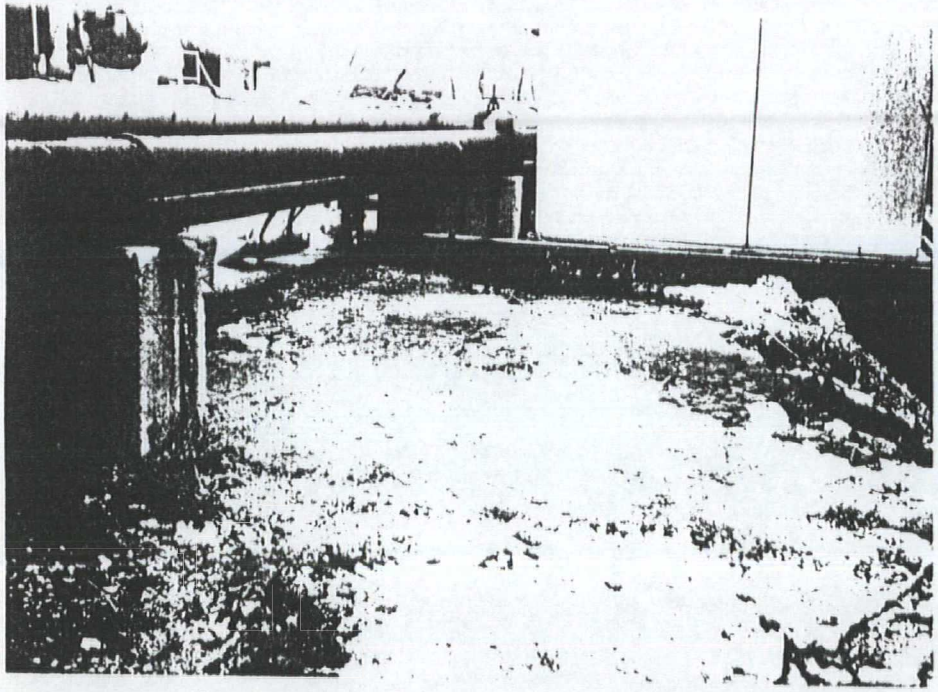


Clean-up in progress

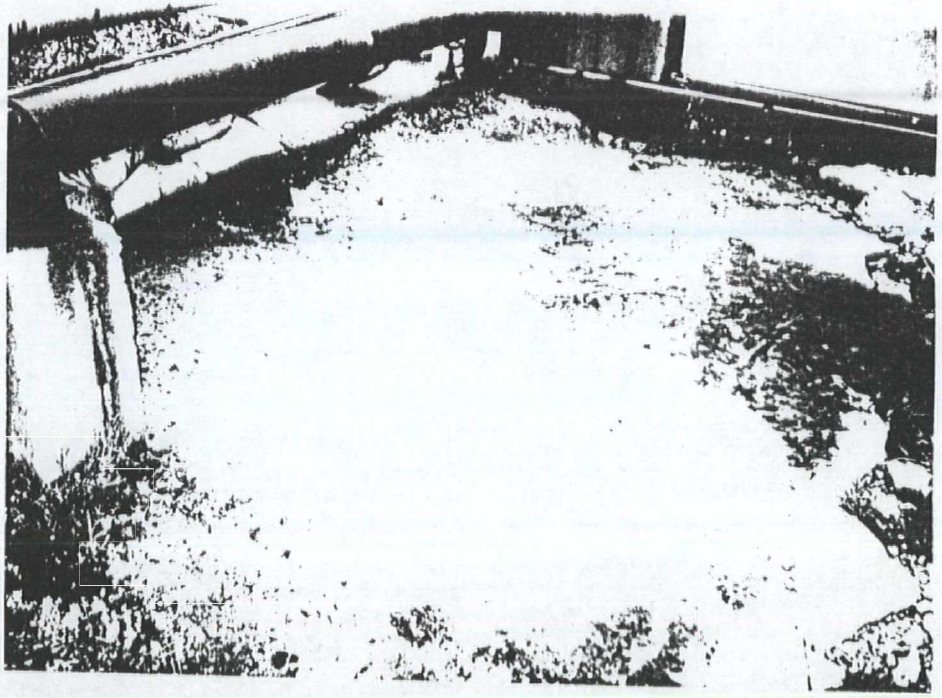
(looking north)

APPENDIX II - PHOTOGRAPHS

BARGE CLEANING TRANSFER POINT

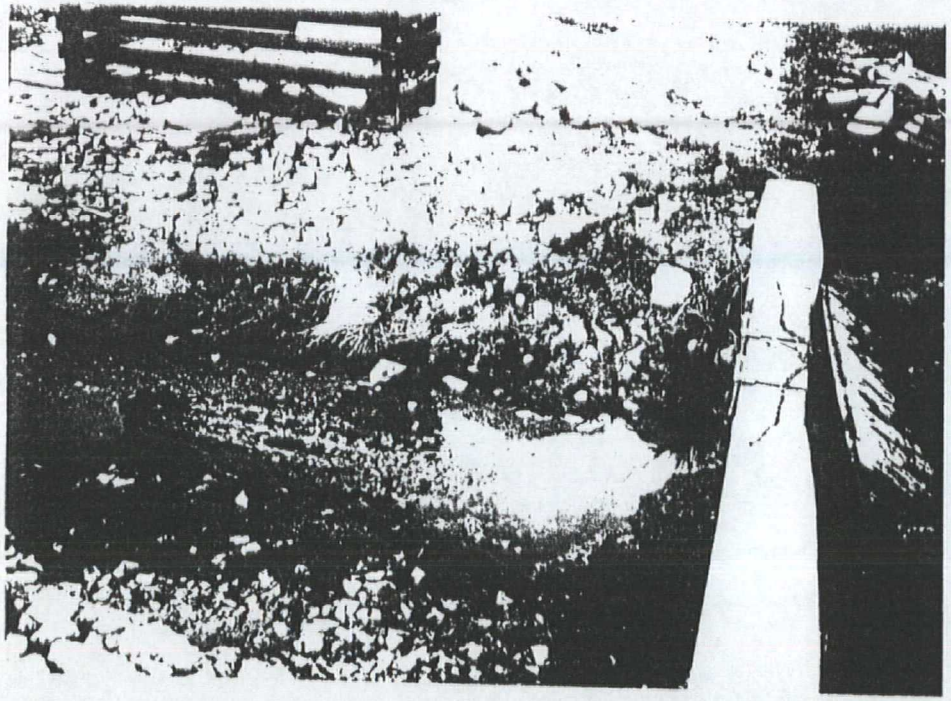


Detail of area after clean-up
(looking northwest)

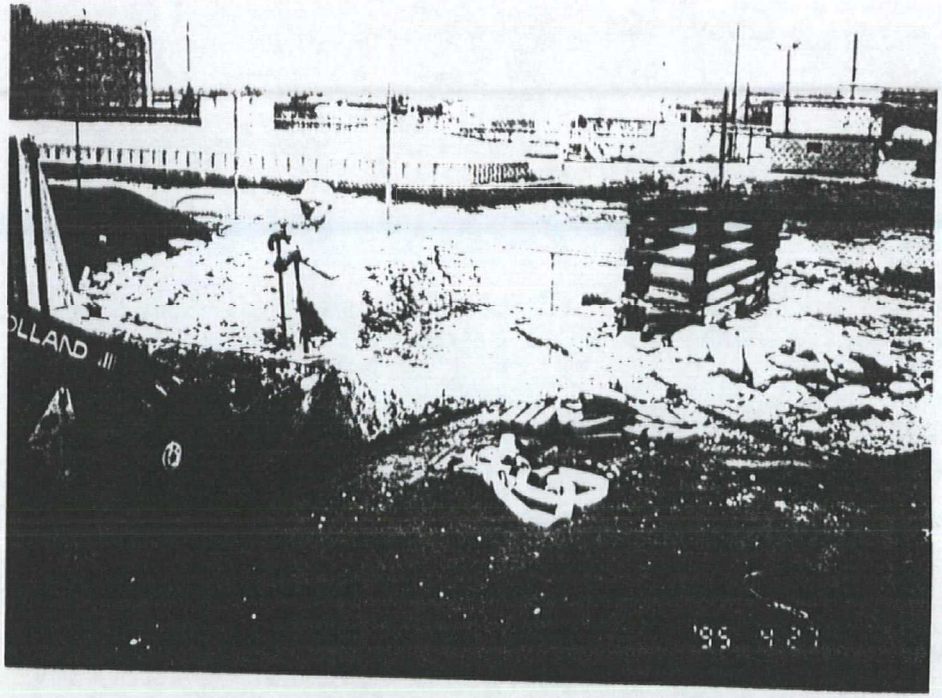


Detail of area after clean-up
(looking northwest)

APPENDIX II - PHOTOGRAPHS
SOUTH END OF DRAINAGE DITCH



Area prior to clean-up
(looking west)



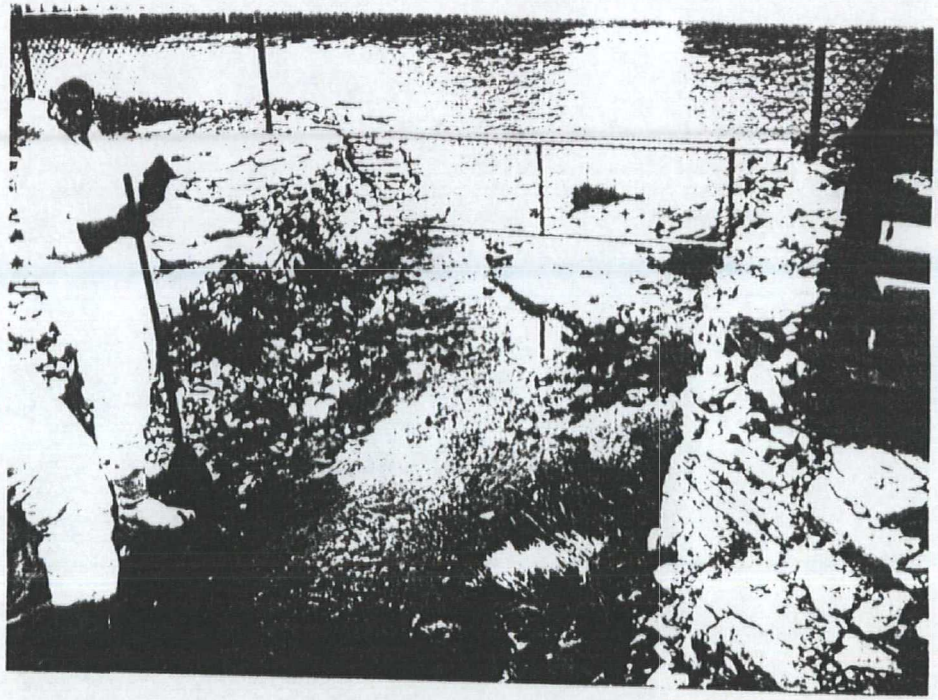
Beginning clean-up
(looking south)

APPENDIX II - PHOTOGRAPHS

SOUTH END OF DRAINAGE DITCH

Clean-up in progress

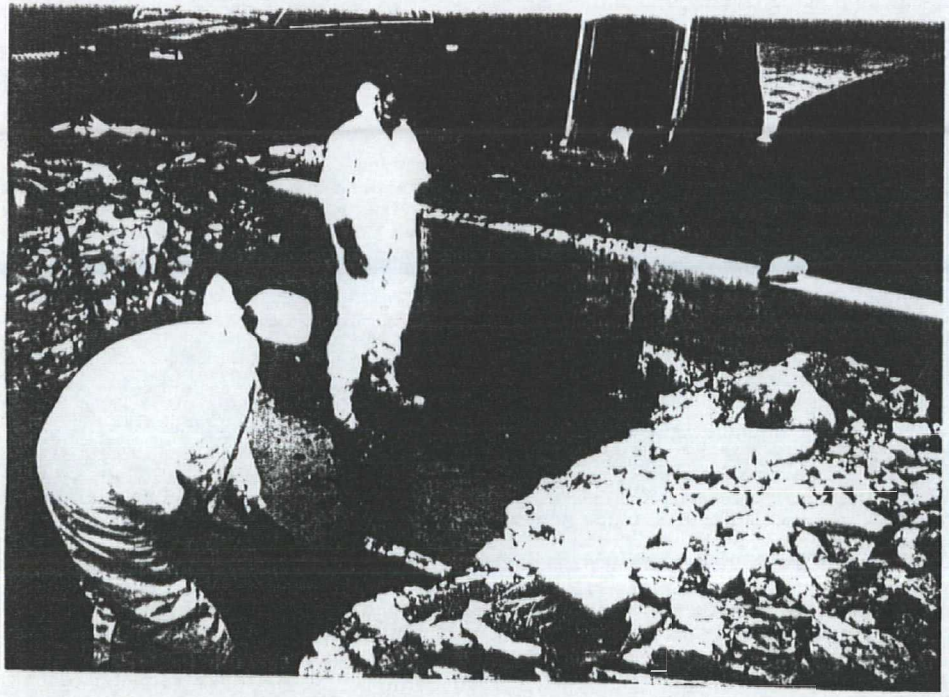
(looking east)



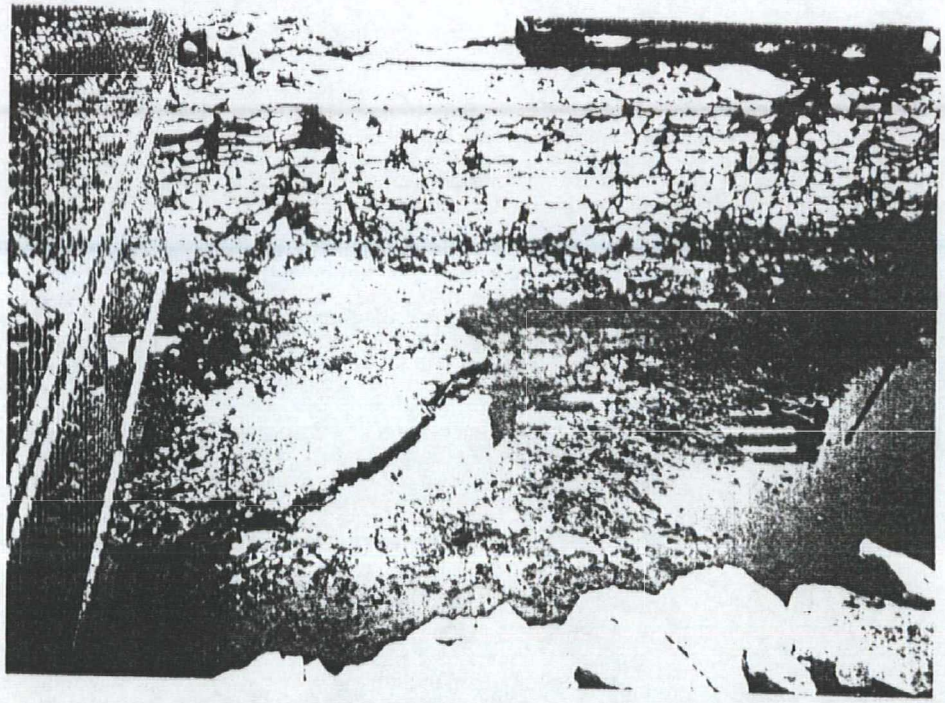
Clean-up in progress

(looking south)

APPENDIX II - PHOTOGRAPHS
SOUTH END OF DRAINAGE DITCH

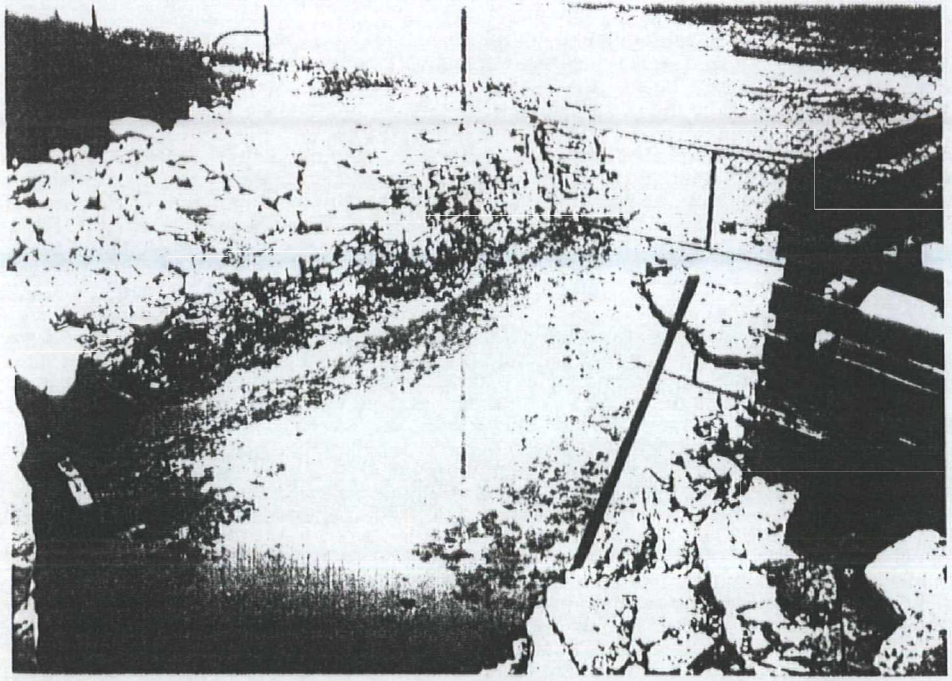


Completion of clean-up
(looking northwest)



Detail of area after clean-up
(looking west)

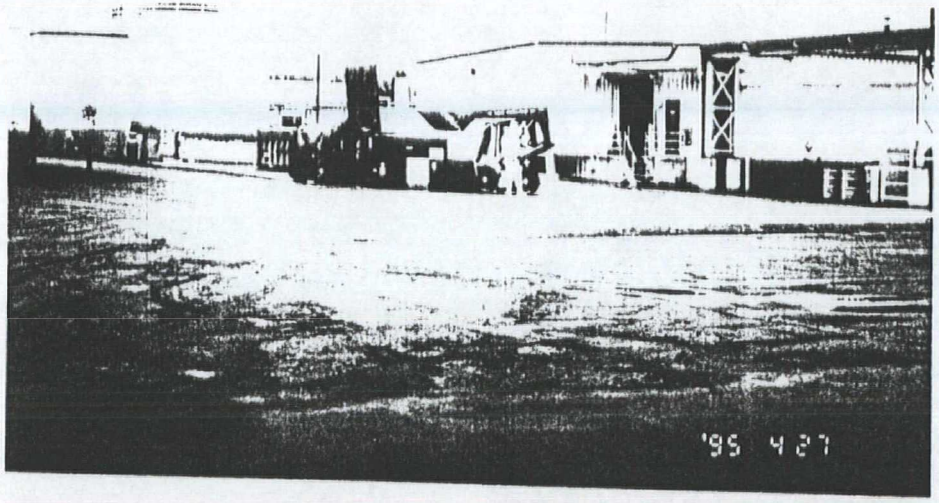
APPENDIX II - PHOTOGRAPHS
SOUTH END OF DRAINAGE DITCH



Detail of area after clean-up
(looking southeast)

Detail of area after clean-up
(looking northeast)

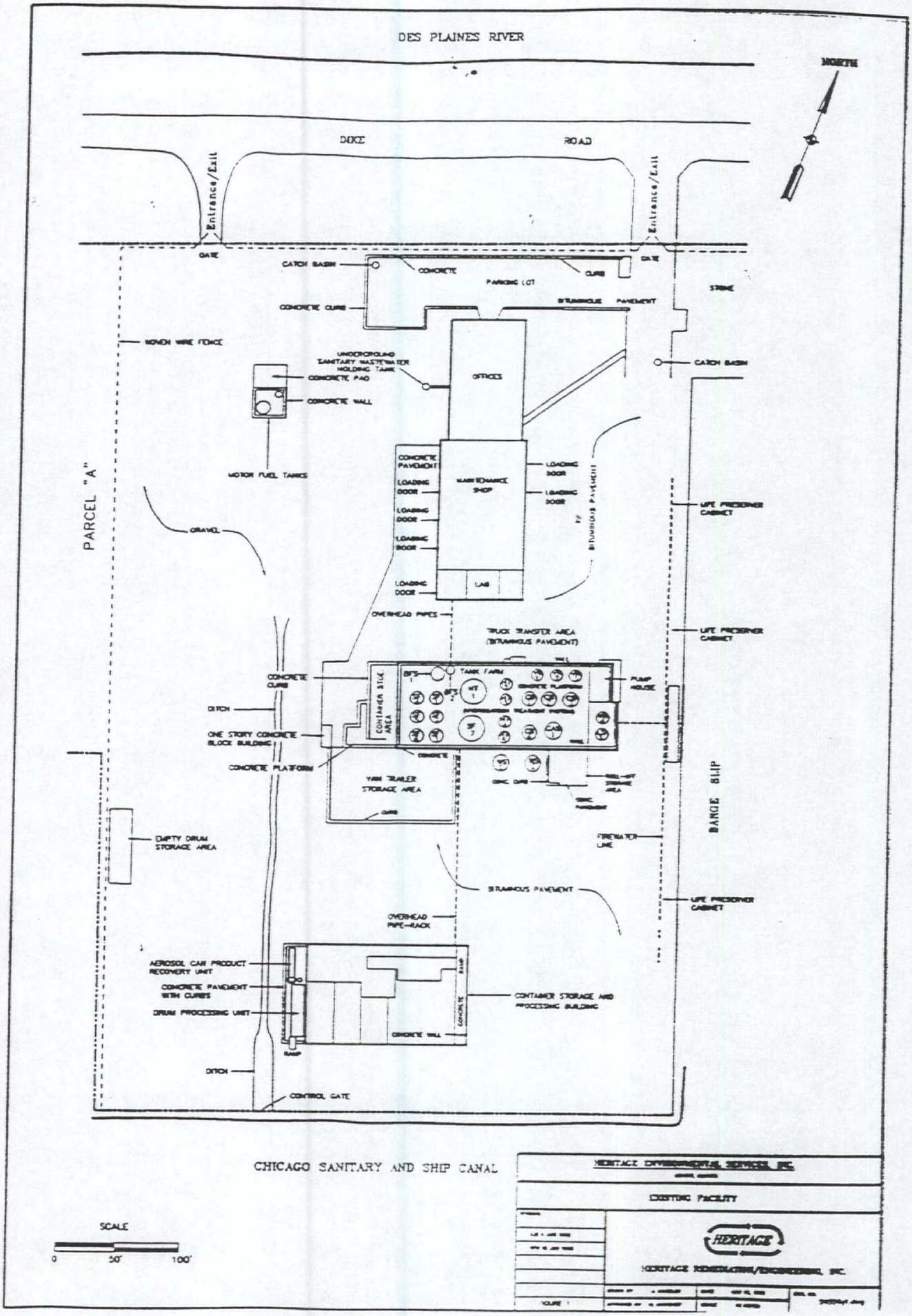
APPENDIX II - PHOTOGRAPHS

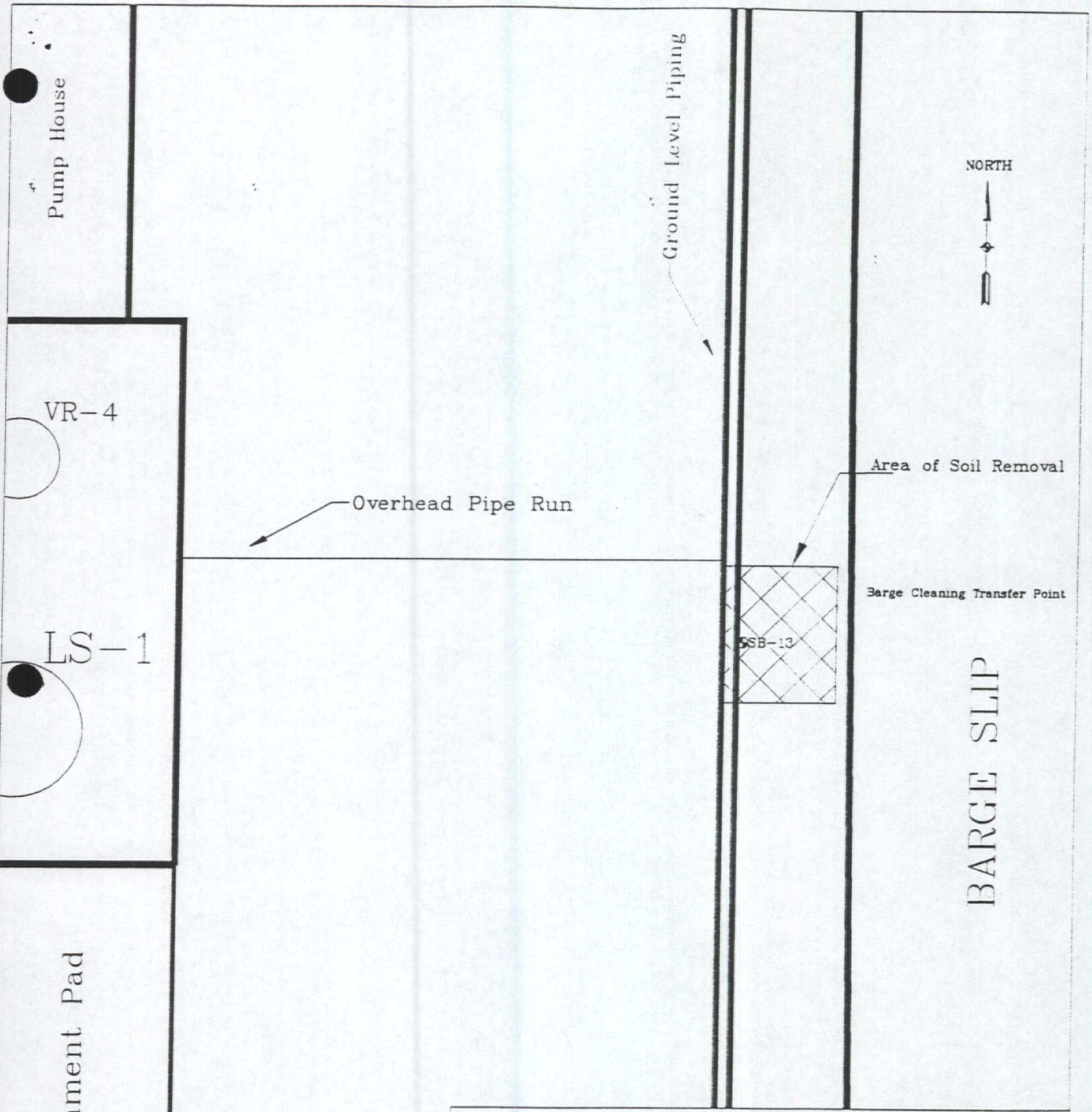


Transfer of soil from Bobcat bucket to roll-off

(looking southwest)

APPENDIX III
FIGURES


DES PLAINES RIVER
NORTH
DIKE
ROAD
Entrance/Exit
Entrance/Exit
GATE
GATE
CATCH BASIN
CONCRETE
CURB
PARKING LOT
CONCRETE CURB
BITUMINOUS PAVEMENT
STONE
WOVEN WIRE FENCE
UNDERGROUND SANITARY WASTEWATER HOLDING TANK
CONCRETE PAD
CONCRETE WALL
OFFICES
CATCH BASIN
MOTOR FUEL TANKS
CONCRETE PAVEMENT
LOADING DOOR
MAINTENANCE SHOP
LOADING DOOR
LOADING DOOR
LOADING DOOR
LOADING DOOR
LAB
LOADING DOOR
BITUMINOUS PAVEMENT
LIFE PRESERVER CABINET
PARCEL "A"
GRAVEL
OVERHEAD PIPES
TRUCK TRANSFER AREA (BITUMINOUS PAVEMENT)
LIFE PRESERVER CABINET
CONCRETE CURB
TANK FARM
PUMP HOUSE
DITCH
CONTAINER STOCK AREA
ONE STORY CONCRETE BLOCK BUILDING
CONCRETE PLATFORM
VAN TRAILER STORAGE AREA
CONC. CURB
CONC. PAVEMENT
FIRE WATER LINE
BARGE SLIP
EMPTY DRUM STORAGE AREA
BITUMINOUS PAVEMENT
LIFE PRESERVER CABINET
OVERHEAD PIPE-RACK
AEROSOL CAN PRODUCT RECOVERY UNIT
CONCRETE PAVEMENT WITH CURBS
DRUM PROCESSING UNIT
CONCRETE
CONCRETE WALL
CONTAINER STORAGE AND PROCESSING BUILDING
RAMP
DITCH
CONTROL GATE
CHICAGO SANITARY AND SHIP CANAL
SCALE
0
50'
100'
HERITAGE ENVIRONMENTAL SERVICES, INC.
EXISTING FACILITY
HERITAGE
HERITAGE REMEDIATION/ENGINEERING, INC.

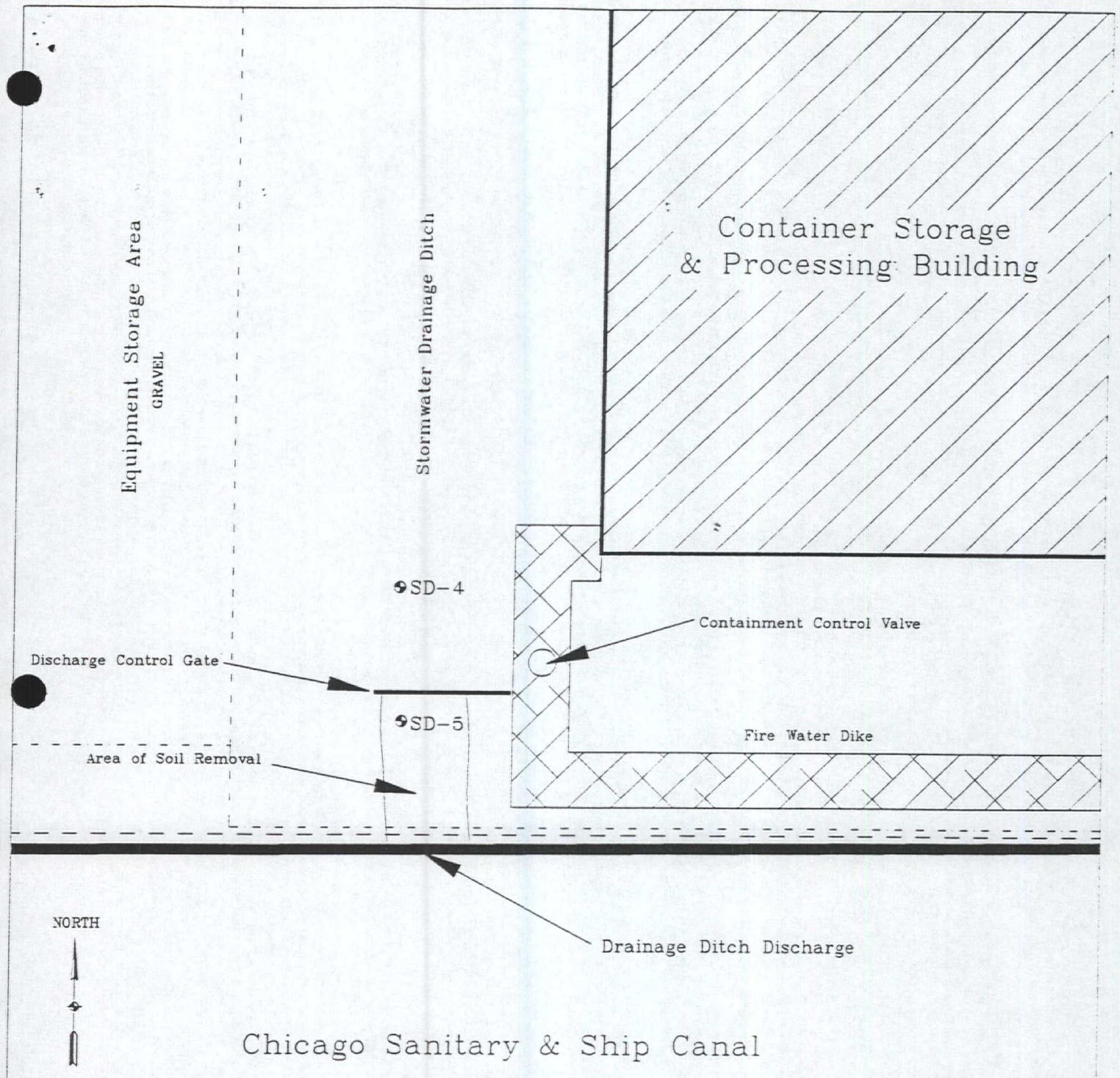


SSB-13 RFI Sampling Point

HERITAGE ENVIRONMENTAL SERVICES, INC.
LEMONT, ILLINOIS

BARGE CLEANING TRANSFER POINT SOIL REMOVAL

REVISIONS			
	HERITAGE ENVIRONMENTAL SERVICES, INC.		
	DRAWN BY: RPW	DATE: 11 MAY 1995	FIGURE 2
	APPROVED BY:	SCALE: 1" = 10'	JOB NO. 0000



HERITAGE ENVIRONMENTAL SERVICES, INC.
LEMONT, ILLINOIS

DRAINAGE DITCH DISCHARGE POINT SOIL REMOVAL

REVISIONS

HERITAGE ENVIRONMENTAL SERVICES, INC.

DRAWN BY RPW	DATE 11 MAY 1995	FIGURE 3	
APPROVED BY	SCALE 1" = 20'	JOB NO.	3000

— — — — — — Property Line

● - - - - - - - Fence Line

SD-4 RFI Sampling Point

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director
217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

February 28, 1995

Mr. Robert D. Garcia
Heritage Environmental Services, Inc.
Post Office Box 337
Lemont, Illinois 60439

Mr. Frank E. Dalton
Metropolitan Water Reclamation
District of Greater Chicago
100 East Erie Street
Chicago, Illinois 60611

Re: 0311620007 -- Cook County
Heritage Environmental Services
ILD085349264
Date Received: September 1, 1994
Log No. B-128
RCRA Permits

Dear Mr. Garcia and Mr. Dalton:

This letter is in response to the RCRA Facility Investigation (RFI) Phase I Report for the above-referenced facility that was prepared and submitted by Heritage Remediation/Engineering, Inc.

This report was submitted to meet the initial corrective action requirements set forth in the final RCRA permit issued for the subject facility and the requirements set forth in the Agency's February 2, 1994 letter. The subject report has been reviewed by this Agency and it has been determined that no further corrective action will be necessary at the following solid waste management units (SWMUs): (1) the Truck Transfer Area, (2) the Outdoor Container Storage Area, (3) the Van Trailer Container Storage Area, (4) the Old Aerosol Can Crushing Unit, (5) the Roll-off Box Storage Area and Drum Crushing Unit, and (6) the Underground Sanitary Waste Holding Tanks. The other recommendations proposed in Section 6.0 of the report are approved subject to the following Conditions:

1. Because some contamination will be left in place at the Outdoor Container Storage Area, the Van Trailer Storage Area, the Old Aerosol Container Storage Area, and the paved portion of the Drainage Ditch Leading to the Chicago Sanitary and Ship Canal, site safety plans for any future excavation and/or construction at these areas must address worker exposure to the remaining soil contamination.

2. Soil removal efforts at the Barge Cleaning Transfer Point and the Drainage Ditch Leading to the Chicago Sanitary and Ship Canal presented in Section 6.2 Items 1 and 3 respectively should meet the following requirements:

   a. All exposed soils and/or sediments should be removed from both areas mentioned above to the underlying bedrock surface;

b. Soils and/or sediments removed from both areas should be managed and disposed of as hazardous wastes in accordance with 35 IAC 722, 723, 728, and 809, as well as all applicable federal requirements;

c. To avoid creating a RCRA regulated unit during the soil removal activities, it is recommended that Heritage Environmental Systems obtain any additional necessary permits for waste disposal prior to initiating soil removal. If it is necessary to store excavated hazardous waste on-site prior to off-site disposal, do so only in containers or tanks. Do not create regulated waste pile units by storing the excavated hazardous waste in piles; and

d. Upon completion of soil removal activities, no further corrective action activities will be necessary at either area. In addition, it will not be necessary to perform verification sampling at either area.

3. Soil removal efforts should be completed by June 1, 1995. When the soil removal efforts have been completed the owner or operator must submit to the Agency certification both by the owner or operator and by a registered professional engineer that the soil removal efforts meet the requirements of Condition 2 above. This certification must be received by the Agency within sixty (60) days after closure, or by August 1, 1995. These dates may be revised if Heritage finds that additional time is necessary to complete the soil removal activities and demonstrates to the Agency that it is attempting to complete closure in a timely manner.

The attached certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil removal, soil treatment, backfilling, decontamination activities, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person that practices professional engineering in the State of Illinois or implies that they are a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed in the state of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, Sec. 13.1 of the Illinois Professional Engineering Act.

As part of the certification, to document the soil removal activities at your facility, a Soil Removal Documentation Report must be submitted which includes the following:

a. The volume of waste, waste residue and contaminated soil removed. The term waste includes wastes resulting from decontamination activities;

b. Scaled drawings (including cross-sections) showing the horizontal and vertical boundaries of the extent of the soil removal effort proposed in the subject submittal and required by Condition 2 above was properly implemented;

c. Descriptions of the methods of waste removal, handling, and transport and the equipment used for these activities;

d. The waste manifest numbers;

e. Copies of the waste manifests;

f. Color photo documentation of the soil removal efforts. Document conditions before, during and after the soil removal activities; and

g. A chronological summary of soil removal activities and costs involved.

The original and two (2) copies of all certifications, logs or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Bureau of Land -- #33
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

4. The Agency realizes that the waste from the soil removal efforts addressed above may be incorporated with similar wastes generated by Heritage. If this is done, then Heritage should indicate what quantity of the final volume of waste disposed off-site was from those soil removal efforts in the Soil Removal Documentation Report and on the waste manifests addressed in Condition 3 above.

5. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

6. The procedures for monitoring water pumped from the two witness wells in the Drum Crushing Area and the onsite well presented in Section 6.2 Items 7 and 8 respectively are approved. Water removed from these wells should be managed in accordance with 35 IAC 721, 722, and 809. The results of sampling and analysis of the wells, any conclusions drawn, and recommendations for future actions should submitted with the Soil Removal Documentation Report required in Condition 3 above.

Should you have any questions regarding the requirements of this letter, please contact Tom Fiersten at 217/524-3311.

Sincerely,

Harry A. Chappel, P.E.
Hazardous Waste Branch Manager
Permit Section, Bureau of Land

cc: USEPA, Region V -- George Hamper

HAC:TFF:tf
JCH

Attachment: Soil Removal Certification

ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Soil Removal Certification Statement

Heritage Environmental Systems, Inc.

Log B-128

The soil removal efforts at the Barge Cleaning Transfer Point and the Drainage Ditch Leading to the Chicago Sanitary and Ship Canal have been completed in accordance with the requirements of the Agency's February 28, 1995 letter to Heritage Environmental Systems. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

_____ _____

USEPA ID Number Facility Name

_____ _____

Signature of Owner/Operator Date Name and Title

_____ _____

Signature of Registered P.E. Date Name of Registered P.E. and Illinois Registration Number

Mailing Address of P.E.: Registered P.E.'s Seal:

_____

_____

_____

_____

TF:lo/0051X/80